

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**INTELLECTUAL VENTURES I LLC AND IN-
TELLECTUAL VENUTRES II, LLC,**

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 4:24-cv-00980

JURY TRIAL

**DECLARATION OF EMILY TANNENBAUM IN SUPPORT OF DEFENDANT
AMERICAN AIRLINES, INC.'S MOTION TO SEVER AND STAY CLAIMS AGAINST
VIASAT'S IN-FLIGHT CONNECTIVITY SYSTEMS**

I, Emily Tannenbaum, hereby state as follows:

1. I am an attorney at McKool Smith, P.C., and counsel for American Airlines, Inc. (“American”) in this action.
2. I provide this declaration in support of Defendant American Airlines, Inc.’s Motion to Sever and Stay Claims Against Viasat’s In-Flight Connectivity Systems.
3. **Exhibit 1** is a true and correct copy of Viasat, Inc.’s Complaint for Declaratory Judgment against Intellectual Ventures I LLC and Intellectual Ventures II LLC.
4. **Exhibit 2** is a true and correct copy of a list of cases that Intellectual Ventures I LLC and Intellectual Ventures II LLC have filed in the District of Delaware.
5. **Exhibit 3** or “**Riffe Decl.**” is a true and correct copy of a declaration by Bryan Riffe.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of February, 2025 in New York, New York.

/s/ Emily Tannenbaum
Emily Tannenbaum